

# KPS CONSULTING

“Building an Access Bridge in Technology and Telecommunications”

2120 L Street, NW  
Suite 400  
Washington, DC 20037  
202.478.6148  
[kpsconsulting@starpower.net](mailto:kpsconsulting@starpower.net)

---

June 4, 2004

By electronic filing:

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: **Ex Parte Presentation**  
CG Docket No. 98-67

Dear Ms. Dortch:

On June 3, 2004, the undersigned, on behalf of Communication Service for the Deaf, Inc. (CSD), had separate telephone conversations with Jessica Rosenworcel of the Office of Commissioner Capps, Jason Williams of the Office of Commissioner Martin, Scott Bergmann of the Office of Commissioner Adelstein and Gene Fullano of the Consumer and Governmental Affairs Bureau (CGB). All conversations concerned matters likely to be addressed in an upcoming FCC Order on telecommunications relay services (TRS). The following points were made:

- The TRS order should standardize the method by which the FCC determines TRS and video relay service (VRS) rates. The June 2003 Order establishing an interim rate for VRS failed to provide guidelines by which providers can determine allowable expenses. The public needs an opportunity to have input into the final methodology that will be used by the FCC and NECA to determine this and other TRS rates.
- The TRS order should not extend the speed of answer waiver for VRS for another 4 years. Functionally equivalent VRS service requires that this waiver terminate now, or at most be extended for a brief period of time (e.g., one year). Similarly, the order should not waive emergency access for 4 years, although in order for solutions for automated emergency access to be developed, expenses incurred by VRS providers for research and development need to be allowed.

- Non-shared language VRS between Spanish speaking people and VRS users is critical to enable the nation's largest minority to be able to communicate with ASL users who are deaf or hard of hearing. This is particularly true for American Spanish speaking parents of deaf children.
- If the order does not require outreach, it should also not close the door on determining whether outreach should be provided in the future.
- The NPRM portion of the Order should ask about VRS interoperability, specifically, the ability of consumers to communicate with one another across VRS providers.

Sincerely,

Karen Peltz Strauss

Karen Peltz Strauss

Legal Consultant for CSD